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March 26, 2018

The Honorable Cathy Seibel
United States District Judge, Southern District of New York
The Hon. Charles L. Brieant Jr. Federal Building and
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: The Wave Studio, LLC v. General Hotel Management Ltd., et al., No. 7:13-09239-CS-PED (S.D.N.Y.)

Dear Judge Seibel:

With apologies, due to a clerical error, Plaintiff The Wave Studio, LLC (“Wave”) submits this letter to replace its letter dated March 23, 2018 in the above-referenced action, and write in response to Your Honor’s Memo Endorsement dated March 12, 2018 (ECF No. 238), ordering that “The parties should advise by letter, no later than 3/23/18, what they think should happen to the defendants in 13-CV-9239 other than GHM and to the cases related to 13-CV-9239.”

Any dismissal of the action as to any of the remaining defendants prior to the adjudication of the copyright ownership in an action in Singapore would necessarily prejudice Wave’s right to seek redress in any jurisdiction. Wave thus agrees with the defendants’ position in the letter from Matthew J. Van Dusen, counsel for a number of defendants in this action and related actions, to Your Honor dated March 23, 2018 (ECF No. 240), and the other defendants joining in such letter, and respectfully requests that the Stay remain in effect until the forthcoming case Wave intends to file in Singapore is concluded.

Respectfully Submitted,

COBALT LLP



Nate Garhart

NG/NB